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Attorneys for Plaintiffs and the aggrieved employees

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA

LUIS LOPEZ SANTOS; MAURILIO SANTIAGO GARCIA; ESTELA PONCE PEREZ; CARMEN LOPEZ SANTIAGO; CRISTINA LOPEZ SOLANO; ARTURO LOPEZ SOLANO; MARGARITO MARCELINO HERNANDEZ; an individual, on behalf of the State of California, as a private attorney general,

PLAINTIFFS,

v.

WEST COAST BERRY FARMS, LLC; and DOES 1 thru 50, inclusive,

DEFENDANTS.

Lead Case No. 23CV01149
(Case No. 23CV00578)

[Case Assigned for All Purposes to Hon. Jed Beebe in Dept. SM 4]

DECLARATION OF LUIS LOPEZ SANTOS IN SUPPORT OF MOTION FOR REPRESENTATIVE ACTION SETTLEMENT

Date: February 4, 2027
Time: 8:30 AM
Dept.: SM 4

Complaint Filed: December 5, 2022
Trial Date: None Set

DECLARATION OF LUIS LOPEZ SANTOS

I, Luis Lopez Santos, state and declare as follows:

1. I am a competent adult, over the age of eighteen, and a named Plaintiff in the above-captioned matter. The foregoing is based upon my personal knowledge, and if called as a witness, I could and would testify thereto. I am making this sworn declaration in support of my claims and the claim of my co-workers, and in support of my qualifications as Named Plaintiff. The following is based upon my personal knowledge, and if called as a witness, I could and would testify competently thereto.

2. I am a former employee of Defendant West Coast Berry Farms, LLC ("Defendant") as a housekeeper and I was paid as an hourly employee.

3. I brought this lawsuit, on behalf of myself and all other aggrieved employees, against Defendant because I believe that Defendant did not pay all wages/overtime due, failed to provide compliant rest periods, failed to reimburse necessary business expenses, failed to provide accurate itemized wage statements, and failed to pay all wages due at the time of resignation/termination to me and other employees.

4. I understand that I am representing other employees, and I believe that I am able to represent them well.

5. I have spent significant time throughout this action working with Counsel. I first researched reputable attorneys who are very experienced with these types of lawsuits. Once retained, I compiled relevant documents from my employment to assist my attorneys in litigating this case. I worked with my attorneys to develop the facts and legal claims in this lawsuit. The lawsuit was filed on December 5, 2022.

6. Throughout the litigation, I have provided my attorneys with helpful information for this lawsuit and for the Settlement as needed. Additional work in connection with this matter includes providing information to my attorneys regarding my employment with Defendant, staying in regular contact with my attorneys to discuss the status of the case, responding promptly to my

attorneys' various communications regarding this matter, making myself available for a full-day mediations on August 19, 2024, and September 25, 2025; and reviewing and analyzing the settlement agreement and settlement papers to ensure the settlement was fair and reasonable and in the best interests of the aggrieved employees.

7. Although I did not keep contemporaneous time records, I estimate the total time spent in connection with this matter is approximately 20-25 hours.

8. I believe that I have worked to actively represent the other aggrieved employees and their interests.

9. I have always kept the aggrieved employees' interests at heart in this litigation.

10. I am prepared to continue assisting with this litigation and am committed to achieving the best possible results for the aggrieved employees.

11. Based on my participation in this case, I believe that the settlement obtained on behalf of the aggrieved employees is fair and reasonable in light of the issues involved in this case. As mentioned above, I reviewed and discussed the Settlement Agreement with my attorneys and asked them questions about it to ensure that I understood its terms and what it would mean for all of the class members.

12. I believe that I have fairly represented the absent aggrieved employees and request that the Court finally approve this settlement and confirm me as Plaintiff.

13. I am not aware of any conflicts of interest that prevent me from being confirmed as named Plaintiff in this Lawsuit. I am not related in any way to my attorneys or to any other member of the firm that is representing me. I have no business dealings or other involvement beyond this lawsuit and this representation. I have not been promised any money or inducement to serve as named Plaintiff in this Lawsuit.

14. It is my opinion that the settlement agreement provides for a fair and adequate enhancement for me as a named Plaintiff, in the amount of $5,000.00. I believe that this is fair and reasonable in light of all of the work that I have performed in my role as Plaintiff. As named Plaintiff, I have actively participated in all stages of the litigation, as detailed above, and have

always maintained the best interests of the aggrieved employees while performing my named Plaintiff duties.

15. It is also my opinion that the Enhancement Payment is fair, reasonable, and adequate because, in addition to the many hours spent participating in the prosecution of this case, I accepted the potential risk of being liable for Defendant's attorneys' fees and costs if we were unsuccessful in this Lawsuit. Likewise, I risk the potential stigma of being an aggrieved employee in a representative action labor dispute, which may affect my future employability.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8 day of October, 2026 at Santa Maria, California. (City)

Luis Lopez Santos

(PROOF OF SERVICE)
[CCP 1013(a)(3)]

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On October 26, 2026, I served all interested parties in this action the following documents described as: **DECLARATION OF LUIS LOPEZ SANTOS IN SUPPORT OF MOTION FOR REPRESENTATIVE ACTION SETTLEMENT** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

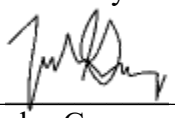
VENTURA COUNTY ASSOCIATION Robert P. Roy Rob-vcaa@pacbell.net Michael P. Roy Mike-vcaa@pacbell.net 916 W. Ventura Blvd. Camarillo, California 93010 **LIGHTGABLER LLP** Michael H. Brody mbrody@lightgablerlaw.com Kathleen M. Fellows kfellows@lightgablerlaw.com Jason Edlinger jedlinger@lightgablerlaw.com 760 Paseo Camarillo, Suite 300 Camarillo, CA 93010	**MARTINEZ AGUILASOCHO LAW, INC.** Edgar Aguilasocho Mario Martinez eaguilasocho@farmworkerlaw.com mmartinez@farmworkerlaw.com info@farmworkerlaw.com P.O. Box 1998 Bakersfield, CA 93303

[XX] **BY ELECTRONIC SERVICE:** I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (https://dir.tfaforms.net/315) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] **(BY ELECTRONIC MAIL TRANSMISSION)**: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on October 26, 2026, at West Hollywood, California.



Taylor Gregg